

**Minutes of the Chemical Transportation
Advisory Committee Meeting
April 12, 2000**

A meeting of the Chemical Transportation Advisory Committee (CTAC) was held on Wednesday, April 12, 2000, at Coast Guard Headquarters, 2100 Second Street, SW, in Washington, DC. The agenda for this meeting was announced in the Federal Register under Coast Guard Docket No. USCG 2000-7053, published on Friday, March 17, 2000 (FR volume 65 number 53).

1. CALL TO ORDER

Mr. Neal Platzer of Franziska Group, Inc. and Chairman of CTAC called the meeting to order at 9:00 a.m.

2. CHAIRMAN'S REMARKS

Mr. Platzer welcomed everyone to the CTAC meeting and expressed his appreciation for everyone's time and efforts with the Committee. He thanked Mr. Paul Book of American Commercial Barge Line (ACBL) for filling in for him as Chairman at the last two CTAC meetings during his illness. Mr. Platzer mentioned that CTAC's mission is to work with the Coast Guard to ensure that bulk hazardous liquids are moved on the water in a manner that is economically effective to the shipper and to the consumer, safe to the mariners and the public, and in a manner that has the least impact on the environment. It had been reassuring, he noted, to see the fine work that the Committee had done in his absence. Mr. Platzer remarked that each member brings a unique talent to this Committee, however, we should share a common goal that this Committee will continue to attract intelligent practical people dedicated to improving marine transportation in the future. He hoped that people just starting out in chemical transportation industry can look at the work CTAC has done, and continues to do, and wants to be a part of that effort.

Mr. Platzer stated that the work and recommendations of the Proper Cargo Naming Committee is just the type of work that helps this Committee build a legacy. He mentioned that the work was broader than just the interest of one individual or one company or even of the industry. He added that the recommendations from this Subcommittee, when implemented, will save money, provide mariners better information on the cargo they are handling, lead to more accurate matching of equipment and cargo, and better availability of accurate information in times of crisis. This work is also well timed to mesh with other upcoming tasks this Committee will be facing. He noted that a debt of gratitude is owed to Mr. Bob Snyder and all those who so tirelessly assisted him.

Mr. Platzer announced that CTAC would be kicking off three new initiatives at the meeting. The initiatives are the carrying on of the Prevention Through People (PTP), the revalidation of previous CTAC recommendations for revisions to 46 CFR 151, and making recommendations for standards and practices to ensure safe and effective emergency response to marine related chemical spill incidents. He stated that all of these efforts build on the past work and fit well within the scope of the CTAC mission. Given the broad range of expertise needed for these three initiatives, every Committee member should be able to participate in at least one of these new Subcommittees. He stated that the heart of this Committee's work is through involvement in Subcommittee activity. The active participation of CTAC's members in taking a broader than "my company" or "my industry" view on tasks is the day-to-day way that they ensure the legacy of this Committee. Mr. Platzer challenged each member to make sure that this continues to happen in the future.

Mr. Platzer thanked the presenters on their hard work and time taken to prepare their presentations. These types of presentations represent the quality this Committee brings forth. Mr. Platzer thanked the Coast Guard and specifically the Executive Director, CDR Bob Corbin, and Sponsor, Rear Admiral North, for their continued confidence in the Committee. Before introducing CDR Corbin, Mr. Platzer briefly reviewed the agenda.

3. EXECUTIVE DIRECTOR'S REMARKS

CDR Robert F. Corbin, Chief of the Hazardous Materials Standards Division and Executive Director of CTAC, welcomed everyone to the CTAC meeting. He thanked the attendees for coming and expressed his hope that they take advantage of the topics and discussions planned for the day. He personally welcomed back the Chairman Mr. Neal Platzer and mentioned that it was great to see him back on his feet again. He also recognized Mr. Dave Trebisacci, of the National Fire Protection Association, who would conduct a presentation on the roles and responsibilities of Marine Chemists. CDR Corbin stated that Rear Admiral North, the Coast Guard's Assistant Commandant for Marine Safety and Environmental Protection and CTAC's sponsor, would not be able to attend today's meeting due to an out-of-town scheduling conflict. CDR Corbin mentioned that ADM North sent his regrets, but wanted him to pass along that he, as well as many other individuals in the Coast Guard, have been extremely impressed with the efforts and accomplishments of CTAC and its Subcommittees in recent years, and that the Committee has his complete and unwavering support.

Quality Shipping

Due to the unavailability of ADM North, CDR Corbin took the opportunity to discuss on behalf of ADM North, an issue of international importance affecting the Coast Guard's Marine Safety and Environmental Protection Directorate: the issue of Quality Shipping.

Quality Shipping, CDR Corbin said, is an issue that seems to be on everyone's mind these days. One question asked is "What can ports do to encourage quality shipping?" CDR Corbin said that much depends on how the port is organized and operated. In the US, each port is a unique mix of privately owned and operated facilities as well as facilities owned and operated by, or leased by, Port Authorities, which are usually State government entities. Port operations on the other hand, he added, are governed by a host of Federal, State, and Local government agencies, such as the Coast Guard, which is responsible for Port Security, Marine Environmental Protection, Waterways Management, Aids to Navigation, Anchorage Management, and Port State Control of Non-US Vessels. This arrangement is hardly the homogenous arrangement that is found elsewhere in the world. Accordingly, the Port Authorities in the U.S. are in a less capable position to improve quality since they have varying degrees of control over the activities in their boundaries. With no central guiding authority, this control is obviously not consistent from port to port. So if Port State Control were vested in ports, it would likewise be inconsistent. CDR Corbin said that the Coast Guard, as the Port State Control Authority, has the regulatory responsibility and authority to address and affect Quality Shipping issues, although it may do this in cooperation with Port Authorities and other agencies. So the next question, CDR Corbin asked is "What is the Quality of Shipping calling on in US ports today, where would we like to see it go, and what incentives do we plan to employ to reach our desired end state?"

CDR Corbin looked at the desired end state. At the 8th session of IMO's Flag State Implementation Subcommittee, they created a working definition of the goal of a flag state: "To have a fleet with a good safety record which causes minimum damage to the marine environment." He mentioned that if the flag states achieve that goal, then all port states would be confident that a vessel of any flag, including its own, calling at its ports, would be in full compliance and ready to respond to any emergency. Vessels would have properly trained seafarers, all safety and environmental protection equipment would be properly

maintained, and safety management systems would be in place. The port state, CDR Corbin continued, would function only as the quality assurance inspector and it would not be cost effective for a non-compliant vessel to compete in the international market. However, we are not there yet, he stated. Although US Port State Control statistics show considerable improvement, with detentions down 33% in 1998 and an additional 25% in 1999, operational deficiencies continue to be a problem, with over 25% of vessel detentions caused by poor crew performance during fire and abandon ship drills. CDR Corbin said that despite improved standards that require basic familiarization training and Standards of Training Certification and Watching keeping (STCW) 95 implementation, many vessel crews still have difficulty demonstrating emergency procedures related to ship safety. Tragedies such as the ERIKA incident, he stated, continue to raise questions and give cause for thought on just how well each element of the chain of responsibility is performing or not performing, and how that chain is only as strong as its weakest link.

CDR Corbin stated that as envisioned by the International Safety Management (ISM) Code, the strongest and most important role in quality shipping belongs to the owners and operators. Then the flag states, classification societies, charterers and insurers play a significant role in ensuring that vessels are properly maintained. He said that they are then followed by the safety net of the Port State and their examinations. CDR Corbin then asked, what the Port State could contribute today to aid the movement of owners, operators, flag states, class, charters and the like toward quality shipping. He stated that there are several possible contributions to assist with developing quality shipping and gave the following initiatives:

Partnering

CDR Corbin said that the continuing establishment and growth of partnerships between different parties involved in the shipping industry would improve the support of quality shipping. The US has formal quality partnerships with eight maritime industry organizations. The purpose of the partnerships, he said is to work more closely together to improve maritime safety and protection of the environment through non-regulatory solutions.

CDR Corbin explained that we need to encourage the continued growth of partnerships, both formal and informal, between parties involved in quality shipping. He stated that these partnerships give us the ability to identify potential problems in the areas of shipping safety, protection of the marine environment, and implementing workable non-regulatory solutions before they become real problems.

Transparency

Transparency, CDR Corbin explained, is the sharing of data and information about ship quality, which will help us achieve our desired state. It is vitally important to ensure that all stakeholders know whom the quality ships, owners, and operators are, and to ensure that only those “quality” ships are carrying cargo. CDR Corbin stated that transparency is promoted in several ways. First, he explained that we publish our detentions on our Port State Control web site (www.uscg.mil/hq/g-m/psc/psc.htm). Second, he said that a list of owners and operators is published who have been associated with more than one detention in the previous 12 months. Additionally, he added that the results of the annual evaluation of Flag States and Classification Societies are published.

CDR Corbin mentioned that there is an agreement to work with the European Commission in the establishment and maintenance of the European Quality Shipping Information System (EQUASIS) which combines the two concepts of partnering and transparency. This system, he explained is scheduled to be on-line on May and is being developed to provide those in the maritime industry with a single point of access to relevant data on Marine Safety and Quality of Ships. He noted that transparency should work both ways and EQUASIS should provide the capability to identify and publicize high quality ships and companies as well as those that are substandard. EQUASIS will contain data from inspections, not just

from detentions. Therefore, quality ships and companies will be evident, as their records will contain inspections that result in no detentions and fewer or no deficiencies.

CDR Corbin stated that continued progress in the implementation of the ISM Code would strengthen the ship owner's relationship to the overall condition of the vessel. Every member of the shipping community must do their part to ensure the ISM Code does not become just another piece of paper. Charterers and insurers must insist that vessels they are associated with be in compliance. Classification societies must verify that the material condition of the vessel corresponds to their ISM Code paperwork. CDR Corbin mentioned that vessel owners must visit their vessels frequently and make sure that internal audits are completed honestly and thoroughly. Port States must insist on full ISM compliance by all visiting vessels and Flag States must monitor their performance to ensure their vessels are complying with all relevant regulations.

Rewards for Quality Vessels

CDR Corbin asked how quality vessels should be rewarded. Some examples of rewards that a Port State can offer are the reduction in the number of Port State inspections. CDR Corbin explained that in the current Port State Control boarding program, a risk-based matrix is used to identify the highest risk vessels for boarding. Besides these criteria, he added, our policies require vessels to be examined at least once a year in US waters. He stated that many of these annual boardings are performed on vessels that rarely have deficiencies. As a result, he said, we are exploring the possibility of identifying those quality vessels and examining them less frequently.

CDR Corbin stated another incentive that is being pursued is a program similar to the Green Award with the cooperation of the major ports. He explained that there are two important concepts, which have made the Green Award successful; quality vessels are identified in a rational manner, and the benefit to the ship owner that has vessels that meet the stringent criteria.

CDR Corbin mentioned that Green Award certified vessels have realized many benefits that can't be easily measured, including pride of certification, excellent safety and Port State Control records, and favorable images with insurers and potential charterers. He added that many European ports have offered financial incentives to Green Award certified vessels.

CDR Corbin summarized that there is significant progress toward our desired state as seen by the reduction in port state control detentions. He added, however, that there is still a need for improvement as vessels continue to be found in a non-compliant status with international conventions. All links in the chain of responsibility must do more to aid in reaching the desired state of "Quality Shipping".

Current CTAC Affairs

CDR Corbin then moved on to topics, which were a little closer to home for CTAC members as well as the attending public. He stated that this was his fourth meeting as Executive Director, and he was excited to see the continued interest shown by the chemical transportation industry in the Committee's work. While it is always impressive to see the high-degree of interest in CTAC, he explained that it is even more gratifying to see the efforts and accomplishments of CTAC's Subcommittees. He noted that it is at the Subcommittee level that the real work of the Committee gets done. This could not be accomplished without strong leadership, CDR Corbin asserted. Accordingly, he thanked and publicly commended all the recent Subcommittee chairs— particularly Mr. Bob Snyder for his efforts with the Proper Cargo Name Subcommittee, and Mr. Cal Bancroft for his efforts with the PTP Subcommittee. In addition, CDR Corbin thanked both the Committee members and members of the general public for serving on those important Subcommittees. CDR Corbin hoped that everyone recognizes the importance of the work of

the Subcommittees, and how it influences the regulations that drive the chemical transportation community. CDR Corbin explained that a good example of this is the Vapor Control System (VCS) Subcommittee, which Mr. Paul Book chaired. The Subcommittee delivered its final report to CTAC and the Coast Guard back in 1997 with additional workgroup reports delivered in 1998. He noted that today, those changes and recommendations are being carefully considered for implementation during the current revision process to the VCS regulations.

CDR Corbin stated that CTAC's most recent Subcommittees have completed their formal task efforts, and it was time to move forward with new initiatives as well as refocus on one past Subcommittee effort. CDR Corbin strongly encouraged all CTAC members and the general public to take the opportunity to review the new Subcommittee Task Statements. He also encouraged those present to share the information with their colleagues who were unable to attend today's meeting and challenge them to get involved.

Committee Membership

With respect to Committee Membership, CDR Corbin regretfully informed those present that the slate for the new CTAC Committee members had not yet been signed by the Secretary of Transportation. He thanked those members with expiring terms who had agreed to extend their membership until new appointments could be made. CDR Corbin advised the Committee members and public that they are currently seeking qualified individuals for the 2000 membership slate.

Closing

CDR Corbin reviewed some standard formalities of the meeting by mentioning that the meeting is audio and video taped for permanent record. The meeting minutes will be prepared from the tapes and notes. He then turned the meeting over to Mr. Platzer.

4. INTRODUCTION OF COMMITTEE MEMBERS AND ATTENDEES

Mr. Platzer asked all Committee members and attendees to introduce themselves and give their affiliation. A listing of attendees is attached as Enclosure (1).

5. APPOINTMENT OF VICE CHAIRMAN

CDR Corbin led the swearing in of Mr. Paul Book to the new position of CTAC Vice chairman. Following the swearing in, Mr. Book gave some brief remarks. He said that he felt honored to be appointed to the Vice-Chair position. He commented that he was proud to work in the Chemical Transportation industry, especially with the quality of individuals that are involved with CTAC.

6. SUBCOMMITTEE REPORTS

A. Environmental Response Subcommittee Report – A New Initiative

Mr. Platzer invited CDR Corbin to initiate the presentation of the Environmental Response Subcommittee Task Statement. The Task Statement is attached as enclosure (2).

CDR Corbin reported that the task title for the purpose of this Subcommittee is to identify, review, and make recommendations on current industry standards and guidelines for hazardous materials response

organizations to represent best practices for ensuring safe and effective emergency response operations to marine transportation-related chemical spill incidents.

CDR Corbin then introduced CAPT Larry Hereth, Chief of the Office of Response at Coast Guard Headquarters who is responsible for the Coast Guard's Emergency Response Program, to give a better background as to why the Coast Guard would like CTAC to take on this task.

CAPT Hereth stated that there are no national standards that relate to a make up of a hazmat response team. He mentioned that the Coast Guard has been talking to industry and the response community about standards that might already be used in their specific companies or standards that may be in place in a variety of organizations throughout the country. CAPT Hereth stated that the Coast Guard felt it was time to ask CTAC for their help with this issue. They would like CTAC's advice on how to proceed with setting the standard, or recognizing if there is a standard already in place. If a standard is not yet in place, he asked, what approach would the Committee recommend the Coast Guard take in the development of a standard. Is there a good example of a consensus-based national standard being used in industry that the Coast Guard could work with (NFPA for example) to establish a consensus-based national standard, he asked? To further explain what is meant by a national standard, CAPT Hereth referred to the makeup of a HAZMAT response team. He asked what the proper makeup of a team that is responding to an incident for source control or mitigation purposes should look like. Presently there is no standard, he stated.

CAPT Hereth asserted that the Coast Guard National Strike Force Team (NSFT) has established their own internal working standard of a 10-member team, which is a fairly conservative threshold. Not everyone agrees with this conservative standard. CAPT Hereth explained that the NSFT has often been confronted by two-member, level A entry teams, so the range of response is significant. Based on these experiences and other projects going on in our office at this time, CAPT Hereth concluded that the Coast Guard is requesting CTAC's advice on determining if there is a national response standard, and if no national standard exists, how should the Coast Guard proceed in putting together a national standard for response teams. CAPT Hereth then asked if there were any questions.

Mr. Platzer introduced the Chair of the Environmental Response Subcommittee, Mr. Parminder Sandhu, of Marathon Ashland Petroleum.

Mr. Sandhu first thanked the Committee, the Chair, and CDR Corbin for this opportunity to Chair this Subcommittee. He explained that he has been in this industry for 28 years responding to chemical incidents and oil spills, nationally and internationally. He has seen the same thing that CAPT Hereth pointed out, where practices have been developed across different organizations, associations, and companies but he is not aware of any current national standards. He feels that this task is a worthwhile endeavor to try to determine what the standards should be and to get the experts in those fields to come in to help us. He asserted that it is not a simple task because there are multitudes of chemicals and these chemicals require different types of responses. We hope to work together to simplify it as well as be useful at the same time so that people can begin to live up to these standards. Mr. Sandhu described that the task statement was pretty clear. He then reread the task statement for everyone.

Since there have been incidents in the past responded to by response organizations, Mr. Sandhu continued, there will be an effort to capture the best practices as alluded earlier. The planned method to conduct this effort is to set up a meeting. He encouraged anyone who has an interest in this to participate and make recommendations of individuals that may not be here today but may be able to lend their knowledge and experience. There are many academic institutions, associations, and companies that have done much work in this area and have their own internal standards, which they live by. He stated that this would be a good opportunity to bring those best practices to the Committee for review. Having participated in the Hazardous Substance Response Plan group in the past, Mr. Sandhu explained, the

effectiveness of the Committee is dependent upon the individuals participating in it. He again encouraged all those having experience in this area to come forth and join this group. Announcements of the meeting will go out and letters will be sent to the various companies explaining the mission so people can get the buy in from their organizations into this whole process. Mr. Sandhu thanked everyone.

Mr. Al Shultz asked if there was a reason why the task was restricted to spills, or if the task could also address chemical incidents.

Mr. Sandhu responded that he wasn't aware of any directive from the Coast Guard, but he imagined that the tasking should encompass both. He then asked Mr. Shultz for examples of incidents where spills would not occur.

Mr. Shultz recalled a chemical incident involving a US Flag chemical tanker that had non-compatible cargo inadvertently loaded into a semi-loaded cargo tank because it was hooked up to the wrong rail car. He noted that it was only because of the expertise of the chemical company that was involved that the incident was handled professionally.

Mr. Sandhu said that the guidance he's received up to this point to Chair this Subcommittee leaves some leeway in defining these things. He stated that as we go through our Subcommittee process and people bring us different issues, then at that point we will be able to define if we can handle these issues in a coordinated way.

CAPT Hereth agreed and responded that regardless if it were bulk or non-bulk response both will essentially be the same and we are interested in comments on both. In response to the incident mentioned by Mr. Shultz, there were no drivers in that area. We could see a response team being required for a potential incident where there are upset containers even though there may be no spill. The same parameters must apply, he explained, and he has no problem with broadening the initiative.

Ms. Ann Hayward Walker of Scientific and Environmental Associates mentioned that there is a recent initiative underway to focus more on measurements so that you have a way to know if you have actually achieved a standard. Ms. Walker asked CAPT Hereth and the Committee if they have any expectations or preferences about whether or not these standards will be qualitative or quantitative, or how well defined they might be.

CAPT Hereth responded that he does not believe that there is any standard out there, so any step in the direction of creating a consensus-based national standard would be a step in the positive direction. Dealing with the success of a response team will almost be another project.

Ms. Alice Johnson of PPG Industries mentioned to CAPT Hereth that the Subcommittee should look at companies around the nation and area contingency plans. She said that PPG has been working on these and including hazardous chemicals, which contains emergency response preparedness planning. She thought that a lot of this work could very easily be moved over.

CAPT Hereth responded to Ms. Johnson by stating that although those plans do address hazmat response and the requirements of certain people to respond, but the exact details of the response team which shows up to conduct the response are not defined and that is what his group is focused on. CAPT Hereth explained that he wants a clearer definition of what your expectations are for how that team might look, what should their competencies be, how would they be able to manage that incident safely, what are the best practices that they might be following when a response team shows up for a response.

Ms. Johnson said that one thing that we could do though is to look very closely at all the HAZMAT items qualifying under 21 CFR 19.10-120. She thought that there is a whole lot of information we can use when we get into Subcommittee work. She thought CAPT Hereth would be surprised at how much of this has already been done.

CAPT Hereth responded to say that they have had a lot of Certified Industrial Hygienists (CIHs) to look at 19.10-120, as well as talking to OSHA members about this issue too. They agree that there are segments that define entry teams and backed up responsibilities. CAPT Hereth explained that nothing puts it all together so that responders know what the team should look like. He noted that Ms. Johnson was correct in saying that there are many reference materials out there, some regulatory, some non-regulatory. CAPT Hereth stated that what we are interested in now is to take these reference materials and bundle them up into some organized form of guidance or doctrine.

Mr. Snyder said that one of the observations that was made during the work his Subcommittee did on cargo identification was that there seemed to be a drastic difference in how emergency response is handled on packaged goods as opposed to how emergency response is attended to either using CHRIS Codes or independent means. He added that there doesn't seem to be a harmonization between the two modes. It seems the packaged mode is very well identified in comparison to the bulk mode. Mr. Snyder asked the Subcommittee if they would be looking at a standard to try to harmonize, whether what goes on for one mode should go on for the other. He then asked if this was part of the task.

CAPT Hereth responded by saying that they have not discussed that particular issue. He said they are just concerned with responding to any type of spill regardless of the source that might require protective entry, for example; what are the exact procedures that we as a group should be following. He mentioned that the Coast Guard has protective interim procedures, but they might not be acceptable to all the companies that operate around the country. He further added that as the Coast Guard is working through projects, including some regulatory projects, and is being confronted with this idea that response teams are required to respond to something, but the definition of what constitutes an adequate response team or under what practices they should be operating is not fully clear. What the Coast Guard is asking the Committee at this stage, CAPT Hereth said, is to clarify the tasking, or to see whether it is already apparent to you from your perspective. If it isn't, should we try to develop a group or work with a standards-setting organization to try to further refine that in some way, shape or form?

Mr. Ronald Stokes of Mobil Chemical Corporation said that he believes that there are a lot of things in existence that can be bundled together as a common path to go down. However, when it comes to dealing with bulk marine transportation some of the types of equipment, major training procedures which may be necessary to deal with these kinds of emergencies may be a distinct departure from packaged type stuff and at some point we may need to look at where this common road will depart, one for bulk, one for packaged.

CAPT Hereth responded to Mr. Stokes by saying that he is not looking for cookbook solutions on how to handle an incident, he's more focused on the organizational model that we would want to follow. For example, OSHA requires a two-person entry team but we've been squeezed on many instances to have one person and one backup person rather than the Coast Guard's standard two-person backup, two-person decon, and two-person entry. CAPT Hereth added that there is nothing you can point to, and say that this is a realistic industry standard that everyone has agreed to. The actual source control methodologies that would be used are very specific to the mode of transportation, specific to the containers, and so forth and we recognize that it is too complicated to get into. That will require subject matter expertise that will be well prepared by the team leader or group supervisor or whoever will be leading the team entry. CAPT Hereth reiterated that what we are more focused on now is looking for a definition of the industry standard of a safe, effective entry team.

Ms. Amy Husted of the Kirby Corporation remarked that the one thing on the Subcommittee level that she would encourage them to look at is the flexibility of the team itself. She stated that there is an underpinning in the NPRM for the Hazardous Substance Response Planning for vessels and facilities and she thought the Subcommittee could draw from that to create an organization that knows each incident will be unique in its character and will give that flexibility to the person responsible for initiating that response.

CAPT Hereth fully agreed with that remark, particularly in the marine mode, the typical standard in an unknown atmosphere is to use level A as your first entry. But the Coast Guard recognizes that if you have an incident on a container vessel and you're down in the hull, it would probably be safer for you to use B unless you have an apparent dermal threat. That suggests that the Coast Guard needs to take a look at this carefully, CAPT Hereth said, and look at it in a flexible way, looking at it specifically relative to this mode of transportation. It is different than dealing with a highway incident, he suggested.

Ms. Margaret Doyle from the Chemical Carrier's Association asked CDR Hereth whether the Coast Guard will be looking at the NFPA 62 responder guide. She explained that it was an excellent document, and really puts its arms around some of the stuff we need to take a look at.

CAPT Hereth responded that the Coast Guard is only asking the Subcommittee for its advice. If you think that the guide is the answer and it's already out there, that's great.

Ms. Doyle said that she felt that 60% of the stuff was in there.

Mr. Sandhu addressed the comment to say that as the Chair of this Subcommittee, he sees that all these practices should be brought to the table and evaluated and adopt what is needed for our use. He mentioned that he wouldn't preclude anything out there that makes sense and is pertinent to our mission.

CAPT Hereth stated that he's not exactly sure what NFPA 62 is. 472 deals with competencies, he said, and addresses the competencies needed for the different entry teams, but does not address how many people are required for each entry team.

Ms. Doyle responded that she has reviewed that document and one of the things that the past Subcommittees found was that when you get outside the port on the marine mode there wasn't much out there.

CAPT Hereth replied that there isn't much out there because the number of incidents in that industry is way down. The dilemma is when you do need assistance, he stated, there are no performance standards you can depend on.

Mr. Book asked CAPT Hereth whether he saw these standards being recommended to industry or he foresaw a regulation coming out.

CAPT Hereth replied that he thought with any standard there is an opportunity to incorporate by reference in a regulatory package. Not knowing what will coming out of this recommendation or similar work, CAPT Hereth didn't think the Coast Guard had any position on that development. He continued that we just recognize that there seems to be an undefined area so we are asking for the Committee's advice. This is an area that needs fine-tuning or packaging, he added.

Ms. Doyle asked CAPT Hereth whether he saw this developing into any sort of Oil Spill Response Organization (OSRO) system where you say "I adhere to these best practices, therefore I am this."

CAPT Hereth responded that the Coast Guard has stated before that like the OSRO program, the Coast Guard does not intend to move in that direction. But, if we are to move in that direction for any reason, we would be faced with that same dilemma of what standards would they apply to the guidelines.

Ms. Doyle stated that the concern we have as shipowners is that if we develop something and we realize that there are many different variables, would we have to list or address all these things in that plan? That's the concern we have and that ties right in with this. She then asked whether her company's ships would have to carry every piece of equipment in this plan.

CAPT Hereth responded that is a subject of regulatory discussion, but the issue for today is to focus on HAZMAT response team makeup. He explained, what goes into a plan is one issue and he agreed that one doesn't want a plan that is very thick. However, he explained, the basic principle of when calling for assistance is that you may have a standard in your mind, but everyone's standard will be different. The Coast Guard wants to set a reasonably adequate standard that reflects safe practices that we will all feel comfortable with. We want to talk more about team make up and less about the details.

Mr. Snyder commented that the difference in the modes is that some modes have a lot more practice than the other modes and when you get to the chemical process side there's going to have to be an awful lot of drills because we're not having many spills.

CAPT Hereth added that even with other transportation modes such as train or highway incidents, or even some of the other spills, when you see some of the teams that show up, you wonder what standards they are applying to their entry team.

Mr. Snyder commented that he knows there are standards in the regulations and knows they have different systems in the package mode. He said he knows people like Ron Stokes and some of the other members have a lot of expertise in that area, but they also have an awful lot of emergency response expertise available for rail, truck and drums, and for packaging since they have a lot of incidents.

At this time, Mr. Platzer opened up the questions for CDR Hereth to the public.

Mr. Dave Trebisacci of NFPA apologized for being out of the room while Mr. Sandhu was making his presentation, but he was able to contact a staff member by the name of Ms. Martha Curtis, who works in the public fire protection end of NFPA. He stated that Ms. Curtis informed him about the NFPA 1600, a brand new document that is titled Disaster Emergency Management and Business Continuity Program. It is a very short document that is used as a recommended practice as opposed to a standard. Ms. Curtis informed him that the document is on the street now and has just been put into effect and adopted by NFPA membership in November of last year. It's only eight pages and they're looking for some input from the Subcommittee and would be willing to work with the Subcommittee to develop the type of standard that the Subcommittee is looking for. Mr. Trebisacci stated that Ms. Curtis would also sign up for the Subcommittee.

Mr. Graham Marshall from Lloyd's Register gave an observation that evolved on the Proper Cargo Naming Subcommittee with Bob Snyder. Mr. Marshall said that the discussion seemed to be arriving at whether there will be a response plan of some sort that should be associated with a chemical name. He noted that it seemed rather obvious that for the marine mode, whatever plan is arrived at for response of hazardous materials should be linked with the chemical finding aid the Coast Guard is putting together. He asked whether the Committee had a response to this.

Mr. Snyder thought that it was an excellent idea. It could be a one-stop shopping guide for a lot of basics.

Mr. Marshal replied that it was exactly his thought. He added that you don't want to have to run to different sources when you're dealing with a chemical spill. If you can just go straight in on the web and access all of your chemical characteristics with all the extras that the chemical finding aid is providing, and then you have your HAZMAT handling advice, he stated.

Mr. Snyder remarked that there are no planning aid examples available today, but what was included was something like a CHRIS Code data element. Not every cargo has a CHRIS Code, so there would be exceptions. He observed that maybe that is something else back in the identification that has loopholes, and that there are things that seem to fall between the cracks. The observation we made against the package mode was that they don't seem to have as many large holes in their system as we do on the bulk side, he said, because they use placards and visual identifications of hazardous substance names.

Mr. Sandhu had one closing comment regarding CAPT Hereth's discussion on team make up, which is a very interesting project to undertake. He said it is our experience over a number of years is that it is always open-ended things when you went to respond. You get the minds together to decided on the magnitude of the chemical and what is necessary. Sometimes certain chemicals need air monitoring and certain chemicals didn't. He said there will be many challenges and we will look forward to addressing them.

B. 46 CFR 151 Revalidation Subcommittee Report

CDR Corbin gave background on this initiative by stating that the task statement, as seen in enclosure (3), is to revalidate the previously recommended revisions to 46 CFR Part 151. CDR Corbin mentioned that this revalidation is to review cases where the recommendations have been superseded by other regulatory or statutory requirements or if they no longer represent safe industry practices, or provide updated recommendations.

Background was given for the people who were not familiar with the past Subcommittee recommendations. The CTAC Subcommittee was formed in 1992 to look at the current regulations of 46 CFR 151 for inland barges carrying bulk liquid hazardous materials. Because the regulations were approximately 30 years old, the Coast Guard asked CTAC to evaluate them and provide recommendations on revisions to those regulations. The CTAC Subcommittee completed its tasks back in 1994 and forwarded a report to the Coast Guard, he said. Last year the Coast Guard initiated a regulatory project to revise the 46 CFR 151 regulations. In September 1999 an Advanced Notice of Proposed Rulemaking (ANPRM) was published in the Federal Register requesting comments. In the ANPRM it was indicated that the Coast Guard would ask CTAC to revisit their previous recommendations because the recommendations were over 5 years old. Essentially, CTAC was being asked to revalidate their previous recommendations and to see if anything needed to be updated.

Mr. Platzer introduced Ms. Alice Johnson of PPG Industries, Chairman of the 46 CFR 151 Subcommittee to give the Subcommittee report.

Ms. Johnson asked for individuals to sign up for the Subcommittee if they were interested in 46 CFR 151. She mentioned that anyone interested in participating in this Subcommittee should first obtain a copy of the 1994 recommendations from CTAC and the ANPRM.

Ms. Johnson stated that the Subcommittee has been challenged with revalidating the rulemaking to ensure that it is commensurate with the recommendations and if not so, to change those recommendations as necessary.

Mr. Platzer interjected at that point to mention that the recommendations are available on the Internet, although the formatting of the document makes it difficult to use. LT Greg Herold offered to send a copy of the recommendations and the ANPRM to everyone who signed up for that Subcommittee. Mr. Platzer then opened up the discussion to the Committee and general public for questions.

Mr. Pete Weber of Sea River Maritime mentioned that he participated in the last go around of the CTAC 46 CFR 151 Subcommittee. Mr. Weber stated his disappointment with the Coast Guard's approach to the handling of the past Subcommittees work and providing feedback on CTAC's recommendations. The history goes back even further than the last CTAC go around, he continued. Originally this issue was at the Towing Safety Advisory Committee (TSAC). TSAC concluded that there weren't many changes that were needed which the Coast Guard seemed to be dissatisfied with. Mr. Weber then explained that the Coast Guard then kicked it to CTAC. CTAC spent two years coming up with their recommendations, and now they get a revalidation sent back to them. Mr. Weber asked what would the Coast Guard like to see? He exclaimed that it would be nice to know! One of the things CTAC came up with in the cargo area was to reconcile Part 151 cargo requirements with Part 153. Does the Coast Guard believe that it's necessary, he asked? Mr. Webber said that it would be nice to get some insight from the Coast Guard before sitting down and spending another six months grinding through this stuff. What's on the table what's off the table, he queried? "Is there any possibility of getting something that will help us along?" he asked.

Ms. Johnson replied by suggesting to Mr. Weber that he join this Subcommittee. The Subcommittee's due date is September 2000. It would be a benefit to have past members on the Subcommittee to help prevent the reinvention of previous work on 46 CFR Part 151.

Mr. Weber spoke up to say that that was fine, but without any guidance, there will be a split where some people are going to think that it should be revised and the carriers will think that it shouldn't be changed because their record is safe. He asked what issue is the Coast Guard trying to address?

CDR Corbin addressed Mr. Weber's questions by first stating that back in 1993 and 1994 he worked as the Coast Guard liaison to this Subcommittee, so he has a good working knowledge of the recommendations that came forward. The recommendations that came out of the Subcommittee were a good piece of work. CDR Corbin explained that it was thorough, people did their job, and it was definitely something useful that the Coast Guard could take a look at while in the process of revising the 46 CFR 151 regulations. What the Coast Guard is really trying to say with this task statement is that they recognize the good work that has previously been done, he continued, but through no fault of the folks in industry, the Coast Guard was slow to implement a regulatory project in this area. When the Coast Guard reached the point where they could initiate a regulatory project, an ANPRM was issued. Since five years have passed since the recommendations have been made and various statutes and regulations have been implemented that could affect the recommendations, and perhaps changes in best practices in industry, the Coast Guard determined that it would be worthwhile to have CTAC look at their previous recommendations. The Coast Guard does not expect CTAC to get into the same detail as before, he exclaimed, but would like this Subcommittee to take into account any new regulations and statutes, and ask if the recommendations are still essentially valid based on possible changing industry viewpoints. However, some people may feel very comfortable with the way the current regulations are, CDR Corbin said. It may be that revisions are not necessary. This is not an issue of whether or not revisions need to occur, it's more a matter of asking the Subcommittee to revalidate their previous recommendations.

Mr. Weber responded that he understands the Coast Guard's position, but there are now two questions. Do we need to change Part 151 or is it safe the way it is? The follow-on question, he stated, is if we are going to change Part 151, how are we going to do it. Mr. Weber felt that CTAC had already answered that question. If the Coast Guard is going to change Part 151 to agree with Part 153, he exclaimed, the changes are already there. Although five years have gone by and changes have occurred, Mr. Weber

believed that the changes have affected the softer side of things, the Prevention Through People type aspects. There hasn't been much technological change affecting what's in the regulation. Mr. Weber suggested that maybe the task statement needs to be re-addressed as to what questions need to be answered.

CDR Corbin replied that in this particular case it is not an issue of whether or not the regulations need to be changed. The Coast Guard has a regulation project moving forward, and because they are in the rulemaking process, he explained that he is very limited as to what he can talk about because of the administrative procedures occurring. But with the ANPRM, comments received to the docket will be evaluated. There are probably comments from people who feel that the regulations do not need to be revised and those will have to be considered and answered. CDR Corbin believes it becomes an issue of asking if the recommendations previously submitted by the Committee are still valid from a standpoint of; "has it been superseded because of any statutory or regulatory issues; or has industry best practices changed, such as people issues affecting training or anything that would affect Prevention Through People type issues." CDR Corbin stated that he is not envisioning a full-blown revision. What he would like to see, he stated, is for the Subcommittee to take the recommendations and look at any new statutory, regulatory, and industry best practices and see if there have been changes that invalidate their past recommendations. CDR Corbin explained that whether or not the Coast Guard uses these recommendations in a regulatory package, in light of what they feel and from the comments coming as a result of the docket, are something they have to consider from a regulatory standpoint.

Mr. Platzer further clarified CDR Corbin's explanation by saying that the question of "Do the regulations need revising or not?" is beyond the scope of the Subcommittee. That is a Coast Guard issue that will have to be handled through the regulatory process.

Mr. Snyder asked whether there was anything in the recommendations that the Coast Guard addressed or is using today. One thing that was mentioned was that Part 151 has not been maintained and there are a lot of differences between Part 151 and Part 153. It was 20 years old when we worked on it 10 years ago, which is 30 years old now, he stated. Are there any pieces of that which have been incorporated into your shop that get addressed more consistently with changes that are made to cargoes, venting, gauging, and personal protection that gets made on ships but not on barges at this time? Does this get done today, or is that something that we still have to comment on, he asked?

CDR Corbin replied to say that the only thing that has changed in Part 151 in terms of the regulations since the recommendations are the cargo tables. When there are changes to carriage requirements or new cargoes, the table is updated on an annual basis. In terms of the actual regulations, no other changes have been made to Part 151.

Mr. Platzer commented that he does not believe that the Coast Guard is taking issue with the Subcommittee's initial recommendations. 46 CFR Part 153 addressed much of the issues more clearly, and whether cargo is being hauled on a foreign ship or a US ship or a barge, there are many safety and environmental precautions that need to be addressed no matter where it's being hauled, he said. Changes that take place internationally are more easily reviewed and the validity is compared better if there is something more in tune with international and at least lends itself to addressing those issues that come up, whether it's in the US or internationally and then have a forum for applying those issues to a U.S. barge. It is not that the Coast Guard is not taking issue with the Subcommittees' past recommendations, but rather that other things have occurred in the last five years, which may make the recommendations obsolete.

Mr. Book said that there have been a couple of examples of changes that have occurred since the recommendations were made. They were referred to earlier as "soft" issues, and some associations have

come up with compliance requirements for membership. But certainly on the mechanical side, the ACBL fleet had very few Vapor Control Systems (VCS) when these regulations were being looked at, but today about 50% or better of their fleet is equipped with an approved VCS. He explained that much of what CTAC put into the recommendations has been incorporated into the regulations such as 46 CFR Part 39, for the particular case just mentioned. If much of this has already been instituted into another source, does this just get included in Part 39 for VCS, or does that to be included in Part 151 also, or does that confuse things, and we just leave Part 39 out of it, he asked?

Mr. Platzer had two questions for CDR Corbin. First he commented that during the past Subcommittee work there was a strong feeling at the time that wording should be incorporated into the regulations rather than reference other regulations. Assuming Part 151 comes out in the form it is now, will it be affected and revisions need to be made regarding the language that was pulled out of some other regulations? CAPT Hereth talk about the move now to incorporate other things just by reference so it is something the Subcommittee needs to think about, he said. In reference to the Proper Cargo Name (PCN) Subcommittee, he asked if it would it be improper to at least review the work, the thoughts, and recommendations that came out of that Subcommittee and see if any of it is applicable to the revisions for Part 151.

CDR Corbin responded that the work of any other Subcommittee, which has been done subsequent to their previous recommendations, would be fair game if in fact that would result in any type of changes to industry practices. He commented that it is up to the discretion of the Subcommittee Chair as to where they want to take this. He then cautioned the Subcommittee Chair not to reinvent the wheel because the work that was previously done was excellent work. .

Mr. Platzer explained that what he was referring to was the Coast Guard's present philosophy. CTAC took a lot of Part 39 and put it in Part 151 almost verbatim to eliminate the need to refer back to Part 39. But now there is a group revising vapor control systems. That group may have some changes that would in turn, since they are not linked documents, have to be changed when they come out and put back into the 151 recommendations. Is the amount of referencing left up to the discretion of the Subcommittee, or does the Coast Guard have a direction on how they would like the Subcommittee to proceed?

Mr. Snyder said that it would be hard to roll in recommendations that are being worked on in the regulatory process. He gave the example of the VCS recommendations that Mr. Book submitted three years ago, and commented that one could not go in and make recommendations now.

Mr. Platzer stated that he was asking whether they should just refer to Part 39, or to leave the language and change Part 151 again.

Mr. Platzer asked for any additional questions or comments, with no replies made.

C. Prevention Through People (PTP) Subcommittee Report

Mr. Platzer reminded both Committee members and members of the public to sign-in at the next break before introducing the new PTP initiatives and CDR Tim Close of the Coast Guard Human Element and Ship Design Division. The PTP Task Statement is attached as enclosure (4).

CDR Tim Close provided the background to the PTP initiative. He spoke briefly on the work that CTAC has performed involving crew fatigue and alertness. He commented that the past work accomplished by the CTAC PTP Subcommittee relating to the Alternate Watchstanding System has been very good and the Coast Guard is doing its best to share that information and the anecdotal experiences from that program.

CDR Close explained that the Coast Guard has some research and development work currently on going for crew alertness. The research involved is a practical application type of development in the marine environment and is focused to reduce fatigue, and to ensure mariners and shoreside personnel maintain alertness. He commented that the Coast Guard is trying to effectively develop a crew endurance management system, where the goal isn't to teach them how to work 22 hours a day, but to get them to recognize that there are some limitations to endurance. The effort will hopefully get them to incorporate a couple of different practices that will help maintain alertness. CDR Close said that the research study that is coming to an end this fall relates to crew alertness on commercial vessels, which involves Keystone Shipping out of Philadelphia, PA. The output will be a crew endurance guidebook specifically geared toward deep-draft vessels. It is intended to be a practical application for use onboard vessels.

CDR Close continued that this study is being tried out with the Alternate Watchstanding System, dietary monitoring, etc. He said that the bigger picture is being looked at. This is not just about sleep, he explained, its about the effects of heat, cold, stress, noise, and vibration on a mariners performance and alertness. In addition to taking the results of previous scientific studies and anecdotal results of the work done related to the Alternate Watchstanding System, the research team is working with inland towing companies to capture alertness measures specifically related to towing vessels. He mentioned that this work is scheduled to be completed in the Fall of 2001. The outcome will be a crew endurance handbook for mariners and their companies to help maintain alertness among their crews.

Building off these concepts is a more long-term project the Coast Guard is working on that is related to fatigue countermeasure analysis, he added. The anticipated product to be developed is an endurance management system with proven countermeasures to maintain crew alertness and combat fatigue. He explained, however, that this effort is a couple of years down the road. At the same time, CDR Close added, the Coast Guard is working with their AWO partnerships, which is one of the PTP partnerships, where we are working on developing an informational brochure to hand out to the mariners on basic information about alertness and endurance.

Working internationally through the International Maritime Organization (IMO) the Coast Guard recently finished a correspondence group where existing information related to alertness, endurance, and fatigue was taken and divided into eight discrete modules, CDR Close said. He further explained that two of the modules are general in nature, but the other modules are specific to masters of deep draft vessels, licensed officers, ratings, owners, ship operators, and naval architects. The information in each module reflects what the person in that part of the industry should know about crew fatigue, alertness, and endurance issues. He added that the Coast Guard is also talking to other advisory committees to share their information and to ask for their recommendations.

CDR Close explained that what the Coast Guard is looking for in the Task Statement, is for CTAC to tell them the best way to get the information out to the people it affects. What medium needs to be employed, would giving the information to the ship owners be sufficient and will the information find its way down to the other elements affected, he asked, or is it necessary to supply more packaged information? Should the Coast Guard go just to the unions or to management and the mariners as well? To be consistent with the PTP doctrine, he explained, this is a non-regulatory solution that is being sought beyond what already exists. Certain things cannot be regulated, he said, such as sleep, eating habits, etc. Whereas, management has much more control of the mariner's schedule, which can have a direct impact on crew fatigue and alertness. The Coast Guard is sitting down with management and workers to let them come up with recommendations and measures to reduce fatigue and maintain alertness. Then, he said, from a more scientific basis, the researchers are taking these recommendations and measuring and determining the effectiveness of the ideas. CDR Close mentioned that the Coast Guard needs input from CTAC, from their segments of industry, and how to get this information out to the stakeholders in the short and long term tasking. .

CDR Close then moved into the second part of the task statement, which relates to risk and risk assessment. He explained that one of the five guiding principles of the PTP approach is to manage risk. What the Coast Guard would suggest to the Subcommittee, CDR Close said in keeping with the task statement, is to take a look at where they can do some effective risk assessment research in industry. The Coast Guard is not looking for detailed numeric probability data, but rather information based on your experience and insight from within the chemical transportation industry. He said that there is much to gain from having the Subcommittee evaluate where the risks are within the chemical transportation industry. The Subcommittee can decide how they want to approach this issue, whether to break it down into one aspect of the industry or a portion of something the industry deals with such as ship to shore, barge to shore transfer operations, etc. CDR Close explained that the biggest gain would come from the assessment of where the risks are within the segments of the industry and then prioritizing them. He mentioned that from the human factor perspective, 80% of accidents are human factors related, whether it's lack of maintenance, attention, lack of training, etc. He mentioned his interests in the results of the assessment. CDR Close then asked whether there were any questions.

Mr. Platzer thanked CDR Close for his presentation, but asked that questions be held off until after the Chair of the Subcommittee had presented. He introduced Ms. Heidi Goebel, Chairman of the PTP Subcommittee.

Ms. Goebel of Arco Transportation Company began her presentation by stating that she is looking forward to the work of the Subcommittee for two reasons. First she mentioned as seen in the PTP tasking, so much of the information out there is not always accessible. Finding out who the stakeholders are and how to get the information out to them will help to improve the industry. Arco Transportation operates in the Alaska trade, which is a very difficult trade, so they are very interested to learn anything they can regard as fatigue and crew alertness. Secondly, as companies' progress with the ISM Code, there comes a point where continuous improvement is becoming more important, she said. Basic systems have been established and industry is now looking towards the quality process moving forward. A great opportunity is for everyone to learn from each other on what is considered the risks in a qualitative approach, she explained. Where many companies in this industry are running on very lean operations, Ms. Goebel commented that this is a great opportunity for CTAC to collectively address big ticket items to help the Coast Guard address resource allocation. It is also a great opportunity to move forward to a continuous improvement process both in the communication and assessment of the future. She encouraged operators, those with experience to be a part of the Subcommittee. It is key to have the people who run the boats be part of this process so that it does produce something of value to this organization, she explained.

Mr. Phil Rynn of the American Bureau of Shipping commented on what CDR Close spoke about relative to arrangement of noise and vibration. Mr. Rynn said that there are international standards out there that are used on ships, not only referred to by those ordering ships in the U.S., but also by the international community. Mr. Rynn did not know if any of the study data that have been done has reflectively indicated the numbers that were in there are suitable or not. He mentioned that there is a NVIC that the Coast Guard put out relative to noise and vibration for U.S. ships which adopts or embodies the international standards that ISO put together. This is the type of information CTAC should be looking at as they are going forward and see how they may have to fine tune that information. If sailors are not performing well because of problems with their environment their working in, then it will effect the international vessels as well. The U.S. waters and environment need to be safe for people working in it.

CDR Close agreed with Mr. Rynn's comments. The Coast Guard is aware of some of the international standards, and clearly they apply to deep draft vessels. The Coast Guard is also looking at similar concerns related to the towing vessels, some of the smaller vessels, and some of the older vessels where

there is the possibility to make inexpensive additions or relocations of the staterooms from the surrounding engine room locations to reduce vibrations and noise, he explained.

Mr. Platzer added to Ms Goebel's point regarding interest in Subcommittee participation by including personnel from waterfront facilities, which handle hazardous bulk liquids. Any shipper that has facilities should see if they have someone that could be part of the Subcommittee as a resource, he noted.

Mr. James Varley of Stolt Parcel Tankers recommended to Ms. Goebel that she might want to work with the National Safety Council. This group seems to be a great one to partner with especially with what CTAC is trying to do, he mentioned. The National Tankship Safety Group seems like another ideal group, especially on the risk side. On the communications side, he recommended contacting organizations such as Intertanko, and CCA, as well as the operators out there to get out the word.

Ms. Goebel said that she was also considering P&I clubs to share that information.

Ms. Doyle suggested that she has a list of these organizations and groups on the CCA website.

Mr. Platzer made reference to the lack of interest shown on the PTP Subcommittee signup sheet and encouraged members of the Committee and the public to participate in this effort. He also warned Committee members that if they didn't signup for a Subcommittee then they could be expected to be assigned to a Subcommittee. He also encouraged those present to look within their shops to see if there is anyone they can recommend for these efforts.

Mr. Platzer commented that the first meetings of the three new Subcommittee initiatives discussed today would be posted in the Federal Register, but probably only the first meetings. The first meetings and all subsequent meetings will be posted on the CTAC home page (<http://www.uscg.mil/hq/g-m/advisory/ctac/ctac.htm>), the Chairs of each Subcommittee will email meeting notifications to Subcommittee members.

Mr. Platzer introduced Mr. Robert Snyder, Chairman of the Proper Cargo Names Subcommittee.

D. Proper Cargo Name (PCN) Subcommittee Report

Mr. Robert Snyder of Union Carbide began his presentation by stating that this would be a brief update on the status of the PCN Subcommittee. The Subcommittee issued its final report and recommendations at the last CTAC meeting in September 1999 in Houston, Texas. The report and the recommendations were accepted by CTAC and now reside with the Coast Guard for their review and for further regulatory action or non-regulatory action on our recommendations, he remarked. The recommendations addressed tasks and issues, such as regulatory inconsistencies, outdated requirements; need for some minor revisions with some new additions, lack of training in the cargo classification system, the development of the Cargo Finding Aid, observations that the bulk liquid chemical emergency response system should be reviewed against the system used in the package modes, 49 CFR, and awareness issues.

Mr. Snyder continued that the Subcommittee remains active through the presentations to elevate aspects of the marine industry's knowledge about the cargo classification process, its exceptions, and the identification and usage requirements. He mentioned that the Subcommittee has participated in the "name game" workshops and presentations while the Coast Guard works on addressing CTAC's recommendations. He noted that the Subcommittee held a meeting in Houston, Texas, in September 1999, the day before the semi-annual CTAC meeting, which was not well attended. Mr. Snyder reported that they learned something from that meeting, but progress was not immediate. The Subcommittee then made a presentation in New Orleans at the Coast Guard 8th District's Industry Day. The presentation was

very short, with a small audience, few questions and little dialogue. From New Orleans they went to St. Louis, Missouri, to the Hazardous Materials Advisory Council (HMAC) meeting where the expertise resides for package shipments. Mr. Snyder reported that it was a very well attended presentation. Most of the HMAC members are very heavy on package expertise, he reported. The Subcommittee reached out to manufacturers who are members of HMAC with package expertise to ensure they know the individual cargo requirements for bulk liquid chemicals are somewhat different and are not regulated in 49 CFR. The session went well with good dialogue and many questions, he noted.

Mr. Snyder reported that another meeting they attended was for the Connecticut Maritime Association held in Connecticut. It went very well with approximately 60 people in attendance. High praise was received from some of the oceangoing carriers that were there and from some of the people involved in training positions, such as Kings Point, Massachusetts Maritime Academy, and Maine Maritime Academy. Many of the attendees were interested in what the issues were and what could be done about them, especially about the training deficiencies, he added.

The Subcommittee will be making a presentation to the Independent Liquid Terminal Association (ILTA) on June 13th to present an overview of the cargo classification process and the “name game” problems. Mr. Snyder explained that there will also be three or more breakout sessions covering cargo classification, the bulk finding aid, emergency response and the CHRIS Code, facility operations manual and cargo identification requirements. Mr. Snyder mentioned that ILTA is going to provide CTAC with tickets for those who are interested in attending the meeting; however, it is not free.

Mr. Snyder also reported that they will be making a presentation at the Marine Log Seminar on the 19th and 20th of September in Washington, DC. The presentation will be an overview of what the Subcommittee is doing, but will not have workshops. The Subcommittee is interested in developing relationships with many of the maritime academies, he added, to see if there are potential candidates in terms of training, to look at what CTAC does, why they do it, and why it is important. There is also some interest through grants, contacts in Meritech, and possibly Merican. The Subcommittee has also written a couple of articles in Proceedings and the Hazardous Cargo Bulletin and would like to write more. After the final report is submitted, he explained, the Subcommittee intends to continue their efforts in awareness outreach because they believe that it is a very important issue and must not be forgotten in the day to day activities of this industry.

Mr. Snyder wished the new Chairs the best of luck with the personnel they get [for their Subcommittees]. He hopes they are as good as the people he had, because he had some of the best people in the business on his side. He then asked whether there were any questions.

Mr. Paul Lambert of SMQI Services informed Mr. Snyder that there would be a meeting in Houston in the SMQI conference room in preparation for the ILTA meeting. He explained that if anyone has any interest in the Subcommittee or what the training package looks like, they are welcome to attend this meeting.

Mr. Snyder apologized for not having a sign up sheet for that meeting. What he realized from past presentations is that they need to know who the audience is to gear their presentation towards the audience.

CDR Corbin stated that the outreach efforts of this Subcommittee are probably the most important efforts for industry. Just to get the word out to the various organizations and groups of individuals who are involved in operations on the waterfront with vessels. He felt that the results from the HMAC conference were very successful wherein they have reached a segment of the targeted population that is not normally addressed in the issues that they deal with but certainly have a part in it. Based on the questions and

comments from the individuals at these conferences, he mentioned that it was a learning experience for them. The time spent on the conference was well worth the output. He would like to see a continued effort from CTAC and this Subcommittee in these types of outreach.

With no further comments or questions, Mr. Platzer adjourned the meeting for lunch at 11:30.

7. Other Business:

A. CTAC Survey Results

LT Greg Herold of the USCG Hazardous Materials Standards Division presented the results of the CTAC survey, which was distributed at the Fall 1999 CTAC meeting. He reported that the basic goals of the survey were to find out where CTAC should head in the future, and to assist with administrative procedures to better serve CTAC. He explained that the survey was divided into three sections: administrative, tasking, and general CTAC information.

LT Herold reported that 55 surveys were distributed and 18 were returned. Although a 100% response is desired, 18 surveys provided ample information to give guidance on where to move in the future, especially with some of the administrative and tasking responses.

LT Herold mentioned that 95% of the surveys returned wanted to maintain the meetings on a semi-annual basis. He added that the majority of surveys returned also wanted to have one semi-annual meeting in Washington, DC and the other meeting at a rotating location throughout the United States. LT Herold reported that there was a large outcry for the tasking of a Subcommittee to look at emergency response for chemical spill incidents. He reported that there was also a large response to continue to build on the efforts of the PCN Subcommittee.

LT Herold explained that a copy of the blank survey was attached to the summary of results so the questions could be reviewed. He mentioned that if anyone would like to see a list of the full responses from the survey, they should contact him for a copy.

Mr. Snyder asked if the Coast Guard would initiate stronger partnerships such as American Waterways Operators (AWO), CMA, and CCA.

CDR Corbin replied that the Coast Guard maintains formal partnerships with organizations such as AWO and informal partnerships with organizations such as CMA and CCA. The Coast Guard works effectively with them on various types of initiatives. CDR Corbin stated that he is not exactly sure what Mr. Snyder means by stronger partnerships, but certainly the Coast Guard has approached many of these organizations for support and information. This is to help the Coast Guard achieve various positions on a number of different initiatives, not only things involved with this committee, but also issues outside such as the IMO initiatives. In terms of what is meant by “stronger” partnerships, CDR Corbin said that he would require more time to think on this issue.

Mr. Platzer introduced Mr. David Trebisacci of the National Fire Protection Association (NFPA).

B. Roles and Responsibilities of a Marine Chemist

Mr. Trebisacci began by thanking the Chairman and the Committee for the opportunity to explain the Marine Chemist program and its roles and responsibilities. A copy of his presentation is included as Enclosure (5) for information.

Mr. Trebisacci started the presentation with a brief overview of NFPA. He explained that the organization is an international not-for-profit consensus codes and standards organization whose mission is to protect people and property from the hazards of fire. NFPA publishes the National Electric Code, Life Safety Code, and the Fire Prevention Code and they have approximately 300 standards in their library that are written and revised every 3-5 years by volunteers or technical committees, he said.

Mr. Trebisacci stated that one standard in particular which is important to the Marine Chemist is NFPA 306, sometimes referred to as the Marine Chemist's "bible," and is called the Standard for the Control of Gas Hazards on Vessels. NFPA 306 falls under NFPA's Marine Field Service (MFS). He commented that NFPA's MFS representatives deal with the outreach to the maritime industry in terms of confined space safety training, advisory service to industry, coordination to revision to NFPA 306, and administrative and technical support to Marine Chemists and Trainees. Mr. Trebisacci stated that NFPA 306 is currently in the revision process and the revised edition will be available in the Summer of 2001. He then added that the primary responsibility of the MFS is to certify and re-certify the Marine Chemists via the Marine Chemist Qualification Board (MCQB).

Industry and government recognize the Marine Chemists as confined space safety experts who practice according to an industry standard (NFPA 306), Mr. Trebisacci stated. He mentioned that the Marine Chemists are trained in industrial hygiene aspects, however only 17 or 18 of them are Certified Industrial Hygienists (CIH). He mentioned that their oversight is maintained by industry and the MCQB. Currently, Mr. Trebisacci noted, there are 92 certified Marine Chemists operating in the field today, all of which are male, however, he hopes to have several certified female Marine Chemists in the near future.

Mr. Trebisacci stated that the NFPA Board of Directors appoints the MCQB. The MCQB ensures that Marine Chemists comply with the rules for certification and recertification. The MCQB has representation from the tankship operators, marine insurers, shipyards, Marine Chemists Association, practicing independent Marine Chemists, the Coast Guard, OSHA, and the Navy. The ultimate goal of the MCQB is to ensure safe practices of the Marine Chemists and to keep everyone safe in the marine industry.

Mr. Trebisacci explained that the certification requirements for the Marine Chemists are a bachelor's degree in any discipline, however, a certain number of college level chemistry courses are required. He added that at least three years of work experience in a laboratory or similar environment, maritime industry employment, and at least 300 hours of field inspection training are also required. In addition, he noted, the Marine Chemist training program has an extensive training curriculum broken up into 18 modules of instruction, which cover industrial hygiene, sampling instrumentation, shipyard layout, etc. Mr. Trebisacci said that this training program concludes with an extensive written and oral examination.

He continued that the re-certification requirements following the initial certification are required every five years. There is also a monthly review by MFS office of a Marine Chemist certificate, he said. The Marine Chemists must also maintain a minimum level of inspection activity by issuing at least 50 inspection certificates within the five-year period. Mr. Trebisacci stated that there were additional requirements for the re-certification of a Marine Chemist that included the completing of a written examination, a review of selected certificates by the MCQB, a medical evaluation, continuing education, and approval by the MCQB.

Mr. Trebisacci explained that NFPA 306 – Control of Gas Hazards on Vessels, applies to vessels carrying or burning as fuel, flammable or combustible liquids, and/or vessels carrying or having carried flammable compressed gases, chemicals in bulk, or other hazardous products. This standard describes the conditions required before a space can be entered or work can be started on any vessel scheduled for construction, alteration, repair, or scrapping. He referenced that this standard applies to cold work, application or

removal of protective coatings, and work involving riveting, welding, burning, or similar fire-producing operations. This standard also applies specifically to those spaces on vessels or in the shipyard that are subject to oxygen deficiency, flammable vapors, and toxic liquids, vapors, and gases.

He states that the Marine Chemists are responsible and authorized to inspect and permit all entry or hot work in spaces on the vessel or in the shipyard. The Marine Chemists must personally determine the conditions of a space, which means that they must physically enter and conduct a visual inspection whenever possible.

Someone asked Mr. Trebisacci whether fall protection or retrieval devices are required when a Marine Chemist physically enters a space to do a visual inspection.

Mr. Trebisacci replied that there is no fall protection standard presently in place, but that he had heard that OSHA and its compliance officers have recently been visiting shipyards, trying to apply what is in the general industry for the confined space standards to the shipyards. This may be the direction it is going for the maritime industry, but nothing is definite.

The person asking the question remarked that they are not able to do this at their facility anymore. They must have all the certifications and the fall protection retrieval devices before entering the space, she added.

Mr. Trebisacci responded that he believes many facilities have gone that route for an extra margin of safety, but that the regulation itself does not state that it is required.

Mr. Varley asked Mr. Trebisacci whether one has to have a standby person if one is having someone do an entry for an inspection.

Mr. Trebisacci replied yes, that the recommendation would be that if you are to enter a space, you need to have a standby person, tank watch, located topside. Most chemists would require that the shipyard competent person accompanies them for the inspection and acts as a standby so that their safety is assured.

Mr. Snyder asked if the responsibilities of the Marine Chemists are in some way connected to what the marine surveyors or chemical inspectors work under.

Mr. Trebisacci responded to say that with the example of American Bureau of Shipping (ABS), their policy states that marine surveyors will not enter a space unless a Marine Chemist certificate has been issued. He explained that as far as the actual work that is involved, the Marine Chemists are actually looking at atmospheric conditions, however, they will note that there is a broken ladder rung, a slippery surface or a sloping surface inside the tank. But for the most part, that is as far as the similarity would be from the chemist to the surveyor or inspector.

Mr. Snyder asked if the chemical inspectors, who enter tanks all the time, use the same equipment and techniques as the Marine Chemist?

Mr. Trebisacci responded that the space would have to be tested by a Marine Chemist before the inspectors' entry.

Mr. Trebisacci went on to continue the discussion on the responsibilities of the Marine Chemists. He explained that a Marine Chemist must determine the three previous cargo loadings, the starting times and conditions of the work allowed taking place within a space, the conditions of lines and valves, and the

conditions of the space and adjacent spaces. He must also issue the Marine Chemist Certificates where upon, he must indicate the space that has been inspected, standard safety designations, note the toxicity levels, instrument test results (flammable vapor, O₂, concentration, etc.), and the space requirements and controls such as ventilation, personal protective equipment, etc.

Mr. Trebisacci explained the Marine Chemist Certificate and the makeup of the document. The certificate is serialized by NFPA. The certificate has the space name, its requirements, specifications, and applicable safety measures which need to be adhered to when entering and working in a particular space.

Mr. Trebisacci explained the standard safety designations (safe for hot work, not safe for hot work, enter with restrictions, inerted, etc), repair classifications (hot work or cold work), and safe conditions.

Mr. Trebisacci commented on the current status of NFPA 306 and its revision process. He encouraged all to review it and make comments when the draft is made available for the public in the coming months. He mentioned the committee would meet this coming winter in Orlando, Florida, to discuss the comments received from the comment period. He then asked if there were any questions concerning the responsibilities of the Marine Chemists?

Mr. Lambert asked Mr. Trebisacci to explain a little more about hot work, cold work, and in particular limited hot work.

Mr. Trebisacci explained that limited hot work was a standard safety designation that was introduced in the 1997 edition. The intent was to give the Chemist a little bit of guidance and to get the chemist to focus on what was being asked for by the repair facility. He explained that if the Chemist chooses to use the designation “safe for limited hot work”, it means that the Chemist will record that safety designation and then beneath it write that hot work is limited to a particular repair, such as a fracture on a bulkhead, so many inches in length, etc. He mentioned that the Marine Chemist would be as specific as possible in order to maintain controls of the situation and keep things safe. A general safe for hot work certificate would indicate that hot work could be done anywhere in that space. Some spaces need a little more guidance, he explained, and if the chemist limits the hot work, then any work done beyond the scope of that limited hot work would void the certificate.

Mr. Book asked if there were any examples in the marine industry of general industry standards.

Mr. Trebisacci responded and gave the examples of refineries, any tank farms located in the heart land, anything not falling under what would be classified as maritime shipyard/ship repair facilities, or anything that would not be directly related to the maritime operations. That is not to say that there aren’t some facilities in Idaho that have mock ups or other parts of the company that are related to maritime and those places would come under 1915 and not the general industry, he explained.

Mr. Richard Rogers of Hvide Marine asked if there are territorial limits to Marine Chemists certificates for hot work on vessels underway.

Mr. Trebisacci said that the qualification board and the NFPA 306 technical committee are taking a look at this right now. The plan is for the standard to actually contain some guidance stating that if marine services are required, no matter where it is, the Chemist will be obliged to follow the standard in the performance of his duty.

Mr. Lambert asked whether there is any electronic communication where one can locate these marine chemists and whether one can find out if any Marine Chemists have lost their certification.

Mr. Trebisacci said that on the NFPA web page there is a directory where you can see the geographic and alphabetic listing of every Marine Chemist. However, if a Marine Chemist has had his certification lifted for any reason, it would not be indicated on this site. The good news is, he said, that it happens so infrequently but if you have questions you can always call our office and we will share that information.

Ms. Goebel asked if a Marine Chemist is suspended, whether he would continue to be listed on that directory.

Mr. Trebisacci said that they might. The directory on the website is fairly new so this situation hasn't happened yet, he noted. However, if the board would lift someone's certification, their name would probably be lifted from the web page listing as well.

Mr. John Salvesen remarked that on one of the first slides the NFPA was an international organization. He then stated that my question to you is that you had a slide about permissible exposure limits, time weight average, and things of that nature, when you are doing your work, regardless of whether it is in the US or not, how do you establish what standards you are going to use. State, federal, local, manufacturer, etc.?

Mr. Trebisacci stated that right now NFPA 306 is applicable by regulation to the Marine Chemists here in the States. But all NFPA standards typically indicate up front that it does not have any jurisdiction over any local, state, provincial, or other agencies in the European Union or Far East so it wouldn't take precedent over what was locally on hand in terms of regulations.

Mr. Salvesen commented that there are multiple Federal, State, and local standards on permissible exposure limits. He then asked which standard would the Marine Chemists use?

Mr. Trebisacci replied that the Marine Chemists will follow the American Conference of Governmental Industrial Hygienists and the Threshold Limit Values (TLV) guide, because typically those TLVs are somewhat lower and more conservative than the permissible exposure limits (PEL) that are established by OSHA. He explained that OSHA has no problem with the confined space experts using the TLV guide as opposed to the PEL guide because it more conservative.

Mr. Platzer asked whether there were any guidance to the Marine Chemist on static producing activities.

Mr. Trebasacci responded that there is a very limited guidance that is mentioned in NFPA 306. However, there is enough to indicate to the Chemists that they have to consider static buildup and discharge. What the Chemists will do, he added, is work to avoid the concentration of flammable vapors as opposed to limiting or getting some advice as how to limit the potential for static buildup and discharge. The NFPA has a couple of other standards that deal with this, but again, it is not mentioned in any great detail in NFPA 306. Although Chemists are routinely trained in recognizing and being aware that this is a major hazard, it may be something the standard should be more proactive in mentioning, he noted.

Mr. Snyder remarked that on the static accumulating cargoes, this was also something that they were hoping to get a requirement for conductive, non-conductive, and semi-conductive cargoes because much of that information is not easily obtained today.

Mr. Book asked if the NFPA has a position on the body cables verses insulating flanges.

Mr. Trebasacci replied that there is some limited information in NFPA 77, which is just a general overview of static electricity but NFPA has no position.

Mr. Platzer thanked Mr. Trebasacci for his presentation and his time. He introduced LT Tim Meyers for the next presentation.

C. Certificate of Inspection – Pilot Program

LT Tim Meyers of the USCG Hazardous Materials Standards Division began his presentation with a brief background of the Certificate of Inspection (COI) Pilot Program, included as Enclosure (6). He mentioned that in 1997, when the PTP Subcommittee was formed, it was assigned a number of short, medium, and long-term tasks. One of these tasks was to take a look at the COI for inland chemical tank barges from a PTP perspective and see if there were any changes to the format that could be made.

LT Meyers reviewed the past work efforts on the COI, explained the purpose and desired outcomes of the PTP Subcommittee, and reported the subcommittee's recommendations on the design of the “proposed” COI.

LT Meyers explained that this program would be implemented over a two-year period, which was intended to coincide with the original two-year inspection cycle. He mentioned that he now understands the inspection cycle is now five years for tank barges, which may effect the implementation period.

The presentation showed an actual COI to show just how unfriendly and difficult they can be and then showed what a new COI is anticipated to look like using the recommendations of the PTP Subcommittee.

LT Meyers explained the first page of the COI form contains various information such as the route and a few paragraphs describing the freshwater service examination intervals. In this particular example the barge is enrolled in the Streamlined Inspection Program (SIP) so there is an endorsement for that program on the face of this certificate. The second page reflects the exam dates, the carriage requirements for cargoes, and the start of the cargo list. It also gives stability information and structural-loading constraints. The form has several pages of just cargoes that the vessel is able to carry with coded information off to the left and right sides. He explained that there are CHRIS Codes on the left and various information on the right. On another page is a list of CHRIS Codes that on many forms are not even in alphabetical order. This is an attempt to show the Vapor Control Authority for this vessel, he said.

Mr. Snyder spoke up to say that there are also inconsistencies in the Captain of the Port, the MSO, or whoever inspects the barges, in how they depicted whether or not you were permitted to transfer materials. At least this will be standardized, which will be nice. Mr. Snyder gave credit to Mr. Tom Micklas, because when he was involved it wasn't called “honor the mariner,” it was called “keep it simple Bubba!”

LT Meyers continued to say that there are about four different versions of how this is done with the Vapor Control Authorizations so it is obvious how confusing it could be and the need for taking a look at revising it.

LT Meyers then explained what the new COI would look like using these principles, and showed that it is reduced down to a two-page document. The first page looks basically the same, he said, which includes the Route, and on the example presented, the Fresh Water Service Intervals. He mentioned that this vessel is in the SIP, which has that endorsement on the new COI as well. The second page, he explained will look much different. It has the hull exam information, but at the very top of the page it has endorsements which replace the huge list of cargoes. At least for the pilot program, it will give any field office that picks up this document direction on how to get more information about the vessel if they need it. Underneath the section for Conditions of Carriage it basically states that only cargo named in the

vessel's Bulk Liquid Cargo Authority and Conditions of Carriage document can be carried and only in the tanks referred to in that document.

LT Meyers gave an example of the updated Bulk Liquid Cargo Authority and Conditions of Carriage document that is issued by the Marine Safety Center (MSC). This document gives the same information that used to be on the COI, he explained. It gives the grade of cargo for flammable cargoes and what part of the regulations it is regulated under; the loading constraints; structural loading constraints; and the stability loading constraints that were on the previous COI and put on this document. LT Meyers noted that the tank group characteristics of the barge is something that is very useful to the Coast Guard Marine Inspector because it summarizes the types of things that the Inspector needs to look at when they inspect the barge. He explained that the MSC would get a listing of the tank group characteristics from the barge owner/operator and put it through their program and evaluate it to decide what cargoes the vessel is allowed to carry.

Mr. Snyder asked if the MSC or the barge owners would issue this document.

LT Meyers answered that it will be issued by the MSC. The same process that happens now, in terms of cargo authority, will continue to take place, he explained. The owner/operator will submit information about the barge or tank group characteristics to the MSC and the MSC does a plan review to decide what can be carried on the vessel. The MSC then informs the owner/operator what the vessel is permitted to carry based on the information submitted. The owner/operator then goes to the local OCMI and offers the barge for inspection and certification and provides this list from MSC. So, the same process will be in place, just the documents will look a little different. Next the MSC takes all this information, processes it, and then types up a list of permitted cargo, sends the list to the owner/operator who, in turn, gives it to the OCMI. The OCMI will have someone on their staff enter this information into the Coast Guard's Marine Safety database. This process takes considerable time and with greater chance of errors. LT Meyers said that the new COI documents will be easier to understand, and the information will be more logically placed for the parties involved. The documents also eliminate much duplication of effort for the Coast Guard.

Mr. Snyder pointed out that the CHRIS Codes data field on the form has numbers. He mentioned that he was aware of what the numbers were for, except for one particular number on the example. Mr. Snyder asked if these particular numbers are identified on the new CHRIS?

Dr. Alan Schneider responded that he didn't know what the number on the example represented.

LT Meyers explained that the cargo without a CHRIS Code was assigned a number. He mentioned that a number needs to be associated with it for tracking purposes. He looked to LT Pat Keffler for his interpretation.

Mr. Snyder remarked that it needs to be better known than with just one person in MSC.

Mr. Keffler of the USCG Marine Safety Center expressed his hope that the information would be finding its way to the Finding Aid so it would reside in the master database. As far as the chemical cargo authority database program works, he explained that there are more cargoes out there that are regulated than in the regulations. Therefore there will always be a difference between what is in the tables, specifically 151.05, and what will be printed on a list of authorized cargoes. There is also a lag between when cargoes are classified and when they get CHRIS Codes, and that's when these number codes are created. He stated that's just how the records are kept.

Mr. Snyder remarked that this is another area that needs to be addressed for consistency or inconsistency.

LT Meyers continued to go over the example format of the Bulk Liquid Cargo Authority and Conditions of Carriage form to show the changes recommended in an effort to make the process easier for the Person in Charge (PIC). LT Meyers explained that there would probably be some changes made to this version of the document as the program progresses. This particular document is rather large, approximately 30 pages, he noted but it takes a look at the tank group characteristics and lists every cargo that could possibly be carried on the barge, as opposed to just listing the cargoes the owner/operator has requested authorization. This is a significant improvement because often times at the last minute, there will be a request to carry some other cargo than what's been authorized and the MSC and local Coast Guard unit will have to go through a drill on a weekend or late Friday afternoon to get immediate authorization for this cargo. He explained that this is not necessarily because the barge is incapable of carrying that type of cargo, it is just a paper work drill. This change should eliminate that problem for the most part. He mentioned that the next two pages of the document are the compatibility chart, and explained that this should help the PIC so he or she will not have to refer back to the CFR to determine whether the barge is loaded properly.

LT Meyers then explained the Pilot Program, which is envisioned to be a one-year program between the New Orleans Marine Safety Office (MSO); issuing the certificates, ACBL; providing the barges that participate in the program, and the MSC that will be generating the Bulk Liquid Cargo Authority and Conditions of Carriage document. He stated that there would be a program evaluation based on input from the barge, facility tankerman, PICs, local Coast Guard field units, and the MSC. The results will be presented to CTAC and then the regulatory change will be initiated. However, regulatory change has already been initiated and is in the initial stages.

LT Meyers then discussed the current project status and projected timeline, which are summarized in Enclosure (6).

Mr. Snyder asked if there was going to be anything circulated to CTAC before it reaches an NPRM stage.

LT Meyers responded by saying that there will be a notice of the pilot program that will go out first. Then the pilot program will start. Not until after the pilot program starts would there be an NPRM. Basically, the NPRM is necessary only to change the wording in one small section of the regulations to allow that list of the cargoes to be removed from the certificate and put in a different place.

CDR Corbin further clarified what LT Meyers had explained. He stated that the reason the Coast Guard is doing the pilot program is to evaluate whether or not there is a likelihood of success for this and to evaluate the comments from the Coast Guard field offices, the company involved from the vessel operator's side, the tankerman, and the facility personnel to see if what we want to do is a success. If the program is not a success, or runs into problems, then the issue becomes "can it be fixed."

Mr. Snyder insisted that he would still like to see a copy before it gets to the NPRM stage.

LT Meyers said that there was a final report that was presented to CTAC and agreed to provide him a copy.

Mr. Snyder remarked that it is connected somewhat to the "name game" which is now connected to the Finding Aid so it needs to be looked at again.

Mr. Platzer asked if the final report included the MSC cargo authority document.

LT Meyers said that it did. However, the document that was included in the report was an earlier version and may look a little different.

Mr. Book recalled that there was even a ballot that was passed out at one of the last meetings that recommended going forward to do this test, and CTAC signed off on the ballot to allow the project to go forward. He mentioned that he had not tallied the ballots, and they were not turned into his office, so he assumed that they were turned in with the power to go forward and induce. Mr. Book also added that one of the comments from his department, back at work, is that going from a 6-7 page COI to a 30 page list of authorized cargoes is a concern from a carrier standpoint. Mr. Book further explained that National Marine was suggested to be the pilot tester. Since that time they've been merged with National Marine, and ACBL is the continued operator. The Coast Guard asked ACBL to be the tester to a one-year pilot program, which ACBL agreed to. As CDR Corbin stated, it is a test. Not everyone in industry necessarily has to be on board with it, he explained. It is better for the PIC, simpler for the Coast Guard, and simpler for the barge operators and who knows where we'll be one year from now. But anyway, there was a ballot.

Mr. Snyder said that it is helpful to massage different segments of your business prior to something like this coming out rather than feeling like being hit with a sledgehammer and chains. The reason why he would like that is so he can start looking at the future before it arrives.

CDR Corbin stated that what is being proposed for this particular pilot program is already in effect for U.S. deep draft tank ships. This is essentially mirroring what is done for COIs for tankships. It is not as if it is a new concept. It is new for the inland barge fleet, but it is something that is already being done out there.

Mr. Snyder remarked and gave an example that his company operates about 100 barges with many tankermen and that this program will have an effect on them.

Mr. Platzer requested that the Committee get copied on this document.

Ms. Husted asked that if CTAC members have comments or revisions on the documents, whether they could be given to LT Meyers.

LT Meyers agreed that any input would be appreciated.

Mr. Weber asked if it was necessary to limit the pilot program to just ACBL, or could others participate. Mr. Weber mentioned that they are familiar with tankships and how they operate, but when you start rolling it into inland barges, the cargo transfer procedures need to be incorporated into this along with the vapor recovery information. He stated that it seems that there might be other ripple affects within the organization that should be evaluated during a pilot program so reasonable comment could be provided to the Coast Guard. If a year goes by, although he isn't sure how ACBL operates, he said, they probably aren't as complicated as his organization, but his company might not be able to get a good feel for what this would do to them. Mr. Weber then asked if others could participate in the pilot program, with one or two barges.

CDR Corbin responded by saying that one of the reasons the Coast Guard chose this manner for implementation was because it was a pilot program. The Coast Guard, recognizing the area of operations is going to be all within the same Coast Guard district, wanted to keep it as simple as possible using one MSO and one barge line. CDR Corbin stated his appreciation for the offer, and said that outside companies or groups such as CTAC should have the opportunity to review the feedback that has come in and perhaps comment as to whether they anticipate there would be potential problems in certain areas or

that the program looks successful. He anticipates that the program won't be without some complications, the question is what are those complications going to be, can they be worked through, and are they major or minor? CDR Corbin reminded everyone that the primary reason the Coast Guard wanted to do this was to try and focus on human factors issues with the tankermen and to try and make life a little easier for them and the facility PICs for transfer operations. There was a lot of information on the COI in a complicated manner. Although the new Bulk Liquid Cargo Authority and Conditions of Carriage document, that would be appended to the transfer procedures may be a little longer than the information contained in the COI, the type of information is more valuable and easier to understand. He explained that rather than having to go back and forth between the COI and the regulations, this was deemed to be a workable solution. The jury will be out until feedback starts coming in.

Mr. Rynn stated that he couldn't read the form that was projected on the screen and asked if there was a weight control on each of those compartments. When he considers the host of products that he can put in there now, he is concerned with overloading. Mr. Rynn said that there has already been a problem in the inland industry with buckling barges and issues of that nature. He cautioned that as something to look forward with.

CDR Corbin responded by saying that just like the current barge COIs, there are weight constraints for both structural and stability requirements.

Mr. Platzer suggested that since a meeting is planned for the fall in New Orleans, one of the possible agenda items might be a presentation by ACBL on the status or update of the pilot program.

Mr. Platzer then introduced Dr. Alan Scheider of the Coast Guard's Hazardous Materials Standards Division.

D. CHRIS Presentation on the Internet

Dr. Schneider began his presentation by stating that the current update to the CHRIS database was owed to the hard work of CTAC. He then gave a brief history on the development of CHRIS as well as the process of updating the new CHRIS.

Dr. Schneider exclaimed that the Coast Guard was able to update the database and it is now available on the Internet, on CD, and in hardcopy. Dr. Schneider explained that the updating was really needed for the Hazardous Substance Response Plan (HSRP). He stated that in updating CHRIS, many more fields were added, obsolete fields were deleted, and the actual data sheets from the Response Methods in CHRIS, volume IV, were added so everything would be self-contained.

Dr. Schneider mentioned that industry has shown tremendous interest in CHRIS. When CHRIS was handed out on CD at the Spill Conference, there was a mob scene, Dr. Schneider exclaimed. The Government Printing Office (GPO) sold 15,000 copies of the 1982 edition.

Dr. Schneider explained that the electronic CHRIS could be searched by cargo name or synonyms, by name fragment, by CHRIS Code, by IMO-UN and DOT ID numbers, and by properties. A summary of the new, improved CHRIS is provided as enclosure (7).

At this point, Dr. Schnieder demonstrated the CHRIS database by actually showing it online.

Mr. Snyder asked if there was any intention to update the Chemical Data Guide in the new version of CHRIS.

Dr. Schnieder replied that there just isn't money in the budget for it.

Dr. Schnieder informed all CTAC members that he had mailed each of them a CD of the CHRIS manual.

Ms. Hayward-Walker asked what systems this database works on.

Dr. Schnieder replied that it works on Windows 95, 98, and NT, however, it does not work on a Macintosh or Windows 2000.

Mr. Jim Fleming wanted to know if the CD was available for purchase.

Dr. Schneider said it was free and anyone is permitted to copy the CD because it is not copyrighted.

Mr. Platzer thanked Dr. Schnieder for his presentation and his efforts with CHRIS.

E. Coast Guard Rulemaking Projects and IMO (BLG) Updates

CDR Corbin introduced Sara Ju, of his staff, the Coast Guard Project Officer for the Marine Vapor Control System Rulemaking project.

Ms. Ju reported that the project is running on schedule. She stated that they have finished the plain language version for the updated facility regulations; 33 CFR Part 154, and the vessel regulations; 46 CFR Part 39. She mentioned that they have also prepared two new appendixes to 33 CFR Part 154, and revised Appendix A. In addition, she explained, they have prepared the discussion section, as well as for the background section for the preamble. She stated that she has personally reviewed all the related regulations concerning VCS and prepared the changes. All of this will be updated as part of the rulemaking process. When the new regulations come out, she said, all of the related regulations would be updated at the same time. Currently, the project team is working on cost analysis. She explained that this is going fairly slow because the person working on it is very busy. However, it is expected to be done within the next few weeks. Ms. Ju noted that they are still looking at this summer to publish the NPRM and by summer of next year the final rule should be published. Ms. Ju said that the public would have 60 days to review the NPRM and submit comments.

Mr. Snyder stated that it would be nice to have more time to review it then the required 60 days.

Ms. Ju said that it could be changed to 90 days. She said that they will try to change it, but can offer no more time beyond the 90 days.

CDR Corbin then introduced Mr. Tom Felleisen, from his staff, to talk briefly about the revisions to 46 CFR 151 regulations.

Mr. Felleisen explained the perception is that the regulations need to be revised, if not substantially, then at least revised in certain areas. He mentioned that the ANPRM and the recommendations are accessible from the Internet on the DOT website under their docket management system under number 5117. The workplan, which is in an internal work stage, has been completed. During this stage it called for revising the workplan after comments have been received from the public so they know what needs to be done. Mr. Felleisen said they are in that phase now, and because of the input from CTAC Subcommittee, they will decide how to proceed and find out whether there is a need to completely revise it following the original CTAC recommendations. Mr. Felleisen stated that they would also look at the recommendations by the AWO where only certain parts of the existing rules are followed. Mr. Felleisen noted that they had not received many comments. Only a few barge lines replied, he said. He was unsure if the other barge

lines that didn't reply came in under the umbrella of AWO or not. That is why they are weighting the AWO comments very heavily. With respect to industry, Mr. Felleisen did not believe that they received any comments from the chemical industry.

CDR Corbin asked Mr. Feillisen if he knows how many comments had been received on the ANPRM docket.

Mr. Felleisen believed there were 10 or 11 comments. Two were received from Shearer, one from Barge Lines, and one from a crackpot stating "I think you're getting away with murder."

Mr. Platzer stated that he thought there were only nine comments, because there was a duplicate.

CDR Corbin introduced LT Michael Roldan, from his staff, to report on the Vessel and Facility Hazardous Substance Response Plan (HSRP) Rulemaking.

LT Roldan reported that the Coast Guard has recently published the Facility Response Plan NPRM on March 31st with a 90-day comment period. He mentioned that information on a public meeting in New Orleans to be held on May 10-11 was also published in that Notice. Comments received on the Vessel Response Plan NPRM are currently being reviewed, he stated. LT Roldan looks forward to rich comments on the facility side to maintain parallelism between the vessel and facility community being regulated. He noted that there are still some issues being wrestled with, but they should be brought to resolution with comments from the facility side.

Someone asked what was the expected date for the final rule.

LT Roldan responded that he was not at liberty to predict, but he could say that a project with this significance, by Commandant Instruction, on average takes about a year and a half from NPRM to Final Rule.

Ms. Doyle asked what chances there would be for a SNPRM for vessels.

LT Roldan replied that he was not at liberty to say.

CDR Corbin addressed the question to say that there is always the possibility, but that is a decision that must be weighed by the Program Manager, by considering all the comments and what the possible implications are whether you go SNPRM or NPRM.

LT Roldan added that if they had any more burdens they could go SNPRM, if the same amount of burdens is maintained or lowered then they could proceed straight to the final.

Mr. Snyder said that he asked LT Roldan the day before the meeting what the difference was between significant and substantial facilities, and LT Roldan explained that there are regulatory definitions that exist to define that for the Captain of the Port to use. Mr. Snyder continued and asked if those regulatory citations were accessible, or if they are Coast Guard standards that are not available to public.

LT Roldan stated that they are available to the public, but the Captain of the Port has a say in determining if it is made available, because it deals with the facility's history. If the operator is safe, they could be downgraded, if they continue to wreak havoc on the environment, they could be upgraded, LT Roldan said. LT. Roldan stated that he could give out as much of what is in the regulation now, but keep in mind that it is still up to the Captain of the Port.

Mr. Snyder explained that he was not looking to bypass the proposal the way that it is written, he was just looking for a better understanding of where the line is drawn so he could tell his people in advance.

CDR Corbin then gave a brief summary of IMO activities related to the chemical transportation industry. He mentioned the handout on the provisional agenda for the meeting at IMO Headquarters on, June 26-30. There will also be an U.S. Safety of Life at Sea (SOLAS) working group meeting to be held on Thursday, June 15, at 9:30 AM at Coast Guard Headquarters. This is an open public meeting where the working group can get public input on some of the agenda items and discuss what the proposed U.S. positions are for some of the issues, CDR Corbin explained.

CDR Corbin briefly went over some of the agenda items as can be seen in enclosure (8).

CDR Corbin asked if there were any questions or comments.

Mr. Weber asked CDR Corbin about the Floating Production/Storage/Offload Unit (FPSO) and Floating Storage Unit (FSU), and if there is someone on his staff that he could direct others to who are interested in this topic and want to find out the status.

CDR Corbin explained that within the Coast Guard his office is like a messenger in a sense that they represent the Coast Guard at BLG. However, they are not the program managers for this, there are a couple of other offices, most noticeably the Office of Compliance and one of the other divisions within the Office of Operating and Environmental Standards that really deal with these issues on a daily basis. He noted the point people on these issues would either be CDR Mark Prescott in G-MSO-2 or LCDR Chris Roberts in G-MOC-3, depending on whether you are talking about standards or compliance.

8. CLOSING

Mr. Platzer asked if there were any other announcements or items to be brought before the Committee, particularly anything that might conflict with the time slot for the next meeting. He mentioned that New Orleans is being considered as the location for the next CTAC meeting that will be held this Fall, tentatively it is scheduled for Sept. 13th. Mr. Platzer stated that ARCO/BP/Phillips have tentatively offered CTAC to visit Avondale Shipyards to view tanker production. This might be of interest from a PTP perspective. Mr. Platzer stated that if there is anything going on in the various industry segments that they would like to present to the Committee, let CDR Corbin or himself know what it is and the applicability to their work. They will see if they want to add it in the upcoming meeting agenda. Mr. Platzer asked if there would be any conflicts for Sept. 13th for the meeting date.

CDR Corbin stated that for anyone involved in TSAC, their Fall meeting is planned for the following day, Sept. 14th in Memphis. He asked if there were any large industry meetings, trade organizations with possible conflicts.

Mr. Platzer asked if there were any other suggestions or comments. He reminded the Subcommittee Chairs that given the first meeting needs to be announced in the Federal Register, the meeting will be about 45 days away.

CDR Corbin asked if there is anyone, that the Committee members know out in industry or within their organizations, who might be interested in membership to the Committee or Subcommittees. If so, please have them get in contact with the Subcommittee Chairs. Membership to the Subcommittees is essentially open to anyone. The only requirement that we have under the Federal Advisory Committee Act is that

the Chairperson of a Subcommittee must be a full member of the Committee. Other than that, the makeup of a Subcommittee could be entirely members of the general public and their involvement is encouraged.

Mr. Platzer asked Mr. Book if he had anything to add before closing the meeting. He then thanked every one for coming and was pleased to see everyone again. He mentioned that he felt it was a good meeting and he looked forward to seeing everyone in New Orleans. The meeting was adjourned at 3:30 p.m.

We certify that these minutes are accurate and complete.

Signed

R. Corbin, CDR, USCG
Executive Director

June, 6, 2000

Signed

Mr. Neal Platzer
Chairman

June 6, 2000

Date

Date

- Encl:
- (1) List of Attendees, April 12, 2000
 - (2) Environmental Response Subcommittee Task Statement
 - (3) 46 CFR Part 151 Revalidation Subcommittee Task Statement
 - (4) PTP Subcommittee Task Statement
 - (5) Roles and Responsibilities of a Marine Chemist
 - (6) Update on the COI Pilot Program
 - (7) CHRIS on the Internet
 - (8) Current IMO Activities Relating to the Chemical Transportation Industry